

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

**FELIPE DE JESUS AVILA-SOTO,
AND OTHERS SIMILARLY
SITUATED**

No: 6:24-cv-01392

JUDGE ROBERT R. SUMMERHAYS

V.

**MAGISTRATE JUDGE CAROL B.
WHITEHURST**

**SOUTH CENTRAL SUGAR CANE
GROWERS' ASSOCIATION AND
STERLING SUGARS, LLC**

**MOTION TO ENROLL LUCY BROWN AS ADDITIONAL COUNSEL OF RECORD
FOR DEFENDANTS**

NOW INTO COURT, comes Brandon Davis, counsel for Defendants South Central Sugar Cane Growers' Association and Sterling Sugars, LLC, who respectfully requests that this Court enroll Lucy Brown (La. Bar Roll No. 41176) of the law firm Phelps Dunbar LLP, Canal Place, 396 Canal Street, Suite 2000, New Orleans, LA 70130, as additional counsel in this matter. Brandon E. Davis, Caroline Perlis, Jennifer Clewis Thomas, and Molly McDiarmid will also remain enrolled as counsel of record, and they consent to Lucy Brown's enrollment as counsel. Lucy Brown also consents to be enrolled as additional counsel.

WHEREFORE, Defendants pray that this this motion be granted and Lucy Brown be enrolled as additional counsel of record.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ Brandon Davis
Brandon E. Davis (La Bar #29823)
Molly McDiarmid (La Bar #36426)
Caroline Perlis (La Bar # 40905)
Jennifer Clewis Thomas (*Admitted Pro Hac Vice*)
365 Canal Street, Suite 2000
New Orleans, Louisiana 70130
Telephone: 504-566-1311
Facsimile: 504-568-9130
brandon.davis@phelps.com
molly.mcdiarmid@phelps.com
caroline.perlis@phelps.com
jennifer.clewis@phelps.com

ATTORNEY FOR DEFENDANTS,
SOUTH CENTRAL SUGAR CANE
GROWERS' ASSOCIATION AND
STERLING SUGARS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of October, 2025, I electronically filed the foregoing Motion to the Clerk of Court for filing and uploading to the CM/ECF system which will send notification of such filing to all participating counsel of record.

/s/ Brandon Davis